

February 7, 2015

Dana Heuer

FOIA Exemption 6

U.S. Environmental Protection Agency, Region 9  
Drinking Water Protection Section, Mail Code WTR-3-2  
Attn: Nancy Rumrill  
75 Hawthorne Street  
San Francisco, CA 94105

Dear MS Rumrill,

I recently attended the Public Hearing on January 22, 2015 in Florence AZ concerning the Proposed Class III UIC Area Permit for Production Test Facility-Florence Copper Project. Due to the large number of people registered to make an oral comment, I did not stay long enough to make my statement, so I am submitting a written statement.

I am a resident of Sun City Anthem at Merrill Ranch in Florence, AZ. When I purchased my property I was assured by the developer, Pulte, that there was a 100 year water supply for the area. I believe that this is still true. The general plan is for upwards of 10,000 new homes in the area. However, if Florence Copper, Inc. (FCI) is allowed to operate a Class III injection well (PTF), it is possible that the injection solution could leak into the drinking water aquifer resulting in permanent contamination of the drinking water source for the general Florence area. This could result in significantly increased cost of water for property owners or possibly even contamination making the water unfit for human use. This could make property values drop significantly or even result in a "ghost town" as people move out of the area.

FCI is proposing to operate the PTF for a period of up to 2 years with post-closure monitoring for a period of up to 5 years. I am not aware that FCI or its corporate owners have any obligation for assuring that the 100 year water supply remains drinkable or even usable. I am also not aware that FCI has made any proposal for close-in monitoring of the drift of the injection solution during the operation of the PTF. I am not aware that FCI or its corporate owners have any financial obligation to residential property owners for the possible loss of property values.

One of the speakers on January 22 said that the project is "technically feasible", but did not address possible reality. It is also "feasible" that the project will fail due to contamination of the drinking water aquifer. Another speaker stated that "copper is essential", referring to its use in many products. The value of the copper produced and the income from the 200-500 jobs the project may generate does not outweigh the value of having a usable and drinkable water supply.

I contend that "water is essential" for all living things: human, animal and vegetable. At Sun City Anthem, Pulte has made a commitment to the Town of Florence to preserve the drinkable water supply

by installing low-water-use fixtures in the homes, use of low-water-use landscaping and the construction of water retention basins with dry wells to recharge the aquifer with runoff water.

Since moving to Arizona 35 years ago I have heard considerable discussions, arguments and wars about water availability and ownership. I do not believe any person, corporation or government entity has the right to risk our water supply for the financial benefit of a person, corporation or government entity.

I request that the U.S. EPA deny the UIC permit for the PTF to Florence Copper, Inc.

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Dana M. Heuer